

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPEL WEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF APRIL MUÑIZ IN SUPPORT OF PLAINTIFFS' SUBMISSION
REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, April Muñiz, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.

2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.

3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.

4. I am a resident of Albemarle County, Virginia, which surrounds the city of Charlottesville. I have lived in and around Charlottesville, Virginia since 1990.

5. I am employed by Veradigm, which is headquartered in Chicago, Illinois. I work remotely and have a rented office space in downtown Charlottesville, a few blocks from the federal courthouse.

6. I have already arranged with my employer to take some time off from work to be available for the trial in *Sines v. Kessler* with the understanding that I will work, as I am able, during trial breaks from my rented office space, given its proximity to the federal courthouse in Charlottesville. If the trial is moved to either Lynchburg, Virginia or Roanoke, Virginia, it will be difficult for me to meet my professional obligations as I will be spending anywhere from two to four hours daily commuting to and from the courthouse for trial.

7. More importantly, I was diagnosed with post-traumatic stress disorder in the wake of the events on August 11-12, 2017 and, having witnessed the car attack on 4th Street, I found it difficult to drive in the weeks following the car attack. I anticipate that the stress of reliving those experiences during the trial will trigger my nervous system again making driving difficult and perhaps unsafe. I have many friends in Charlottesville who live within walking

distance of the federal courthouse who would open their homes to me if I were unable to drive home after court proceedings and I have been counting on this hospitality.

8. Along those same lines, my entire emotional support system is in Charlottesville. I know that the trial itself will be very triggering and I will need to lean on my friends, family, and therapist during this stressful time. Having to commute or relocate by myself to Lynchburg or Roanoke, away from my support system and the people I will need to lean on the most will be an extreme hardship.

9. I also believe that it is important for the trial to happen in Charlottesville given that the events at issue in this case occurred here, in our community. The concept of community is a social construct, and each community is as varied and individual as the members that comprise it. Thirty-one years ago, when I graduated from college, I didn't return home, but instead moved to Charlottesville and chose this community to start my adult life. I did not choose Lynchburg, nor did I choose Roanoke. I feel strongly that that jury pool for this trial be representative of my community, the one that was most affected by the events in question, and that moving it to another part of the Western District would not provide a jury pool reflective of my community's conscience.

10. In short, it is most conducive to my mental health and safety and more convenient for me professionally and personally to participate as a plaintiff in *Sines v. Kessler* if the trial remains in Charlottesville in lieu of relocating to Lynchburg or Roanoke.

11. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2021 in Charlottesville, Virginia.


April Muñiz